UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

HOV SERVICES, INC.,

Civil Action No. 2:11-cv-00522(CCC)(JAD)

Plaintiff,

v.

COGNIZANT TECHNOLOGY SOLUTIONS CORPORATION,

Defendant.

NOTICE OF MOTION SEEKING LEAVE TO FILE AN AMENDED COMPLAINT AND STAY DISCOVERY

TO: Richard G. Rosenblatt, Esq. Morgan Lewis & Bockius, LLP 502 Carnegie Center Princeton, New Jersey 08540

PLEASE TAKE NOTICE that on the 6th day of February, 2012 (unless otherwise instructed by the Court), at 9:00 a.m. or as soon thereafter as counsel may be heard, the undersigned attorneys for Plaintiff HOV Services, Inc. shall move before the Honorable Claire C. Cecchi, U.S.D.J., at the United States District Court for the District of New Jersey, Martin Luther King, Jr. Federal Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07102, for the entry of an Order granting Plaintiff's Motion for Leave to File an Amended Complaint and Stay of Discovery.

In support of this motion, Plaintiff will rely upon the Memorandum of Law and Certification of Counsel annexed hereto.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is attached herewith.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civ. R. 7.1(f), a copy of Plaintiff's proposed First Amended Complaint is attached hereto.

PLEASE TAKE FURTHER NOTICE that Plaintiff hereby requests oral argument on this motion.

McElroy, Deutsch, Mulvaney & Carpenter, LLP Attorneys for Plaintiff HOV Services, Inc.

By: /s/ John P. Leonard

John P. Leonard

Dated: January 13, 2012